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1 group identifier designates which control group a particular control belongs to
2 (*Specification* p.16, lines 7-9) when each particular control is identified in the data
3 structure. In this manner, a convenient method is provided to activate or
4 deactivate a fraction (group) of the controls registered in the data structure
5 (*Specification* p.19, lines 6-16).

6 Claim 1 describes a method of “identifying a control group, the control
7 group being comprised of at least two controls associated in a data structure”.
8 Robertson does not identify a control group comprised of at least two controls
9 associated in a data structure. The Office, however, contends that Robertson does
10 disclose identifying a control group at col. 5, lines 20-27, in Fig. 2a, and at col. 6,
11 lines 24-32 (*Office Action* p.3). Applicant disagrees.

12 Robertson merely loads a control list (step 56 in Fig. 2a) with “a list of
13 possible *cursor locations* for the new screen display” (col. 5, lines 8-10). The
14 control list is a list of cursor locations, not controls. There is nothing about this
15 control list that suggests *identifying* any particular grouping of controls.
16 Furthermore, an activated window having one or more controls (col. 6, lines 30-
17 32) is not a “control group comprised of at least two controls associated in a data
18 structure”, as recited in claim 1. Accordingly, claim 1 is allowable over Robertson
19 for these reasons.

20 Claim 1 also describes “representing the control group with a single status
21 indicator in the data structure” and “directing the activation of the controls of the
22 control group by storing an active value in the single status indicator.”

23 Robertson does not represent a group of controls with a single status
24 indicator in a data structure. The only indicator described in Robertson is a default
25

1 selection flag data bit that indicates which one of the individually stored cursor
2 locations in the control list is the default selection (col. 5, lines 23-28).

3 The Office contends that a cursor on a display (shown as an arrow in
4 Robertson Fig. 3A) is a “single status indicator” (*Office Action* p.3). Applicant
5 disagrees. As described in claim 1, the “single status indicator” represents the
6 control group in the data structure and is a store for an active value to direct the
7 activation of the controls of the control group. A cursor on a display does not
8 represent a control group in a data structure, nor does a cursor store an active
9 value.

10 Furthermore, Robertson does not disclose “directing the activation of the
11 controls of the control group”. Rather, Robertson activates only a single control
12 based on an analysis of each control in the control list (col. 7, lines 20-30).

13 The Office concludes that claim 1 is obvious in light of Robertson “because
14 he teaches associating a list of controls with operative windows” (*Office Action*
15 p.3). Even if Robertson does teach such a feature, this conclusion does not
16 substantiate a basis for rejecting claim 1. Merely associating controls with a
17 window is not “identifying a control group”, “representing the control group with
18 a single status indicator in the data structure”, or “directing the activation of the
19 controls of the control group by storing an active value in the single status
20 indicator”, as recited in claim 1.

21 These three elements of claim 1 are entirely missing from the Robertson
22 reference which the Office relies on to reject claim 1, and no other references have
23 been cited to remedy these deficiencies. Accordingly, claim 1 is allowable over
24 Robertson, and the §103 rejection should be withdrawn.

1 Claim 2 is allowable by virtue of its dependency upon claim 1.
2 Additionally, claim 2 recites “for each control of the control group, identifying a
3 control position...”. As described above in the response to the rejection of
4 claim 1, Robertson does not suggest a control group, and thus, cannot suggest
5 identifying a control position for each control *of a control group*.

6 Claim 2 also describes that “for each control of the control group, ...
7 determining a control distance, the control distance defining a control connecting
8 path which connects the identified location with the control position, calculating a
9 control angle, the control angle being an angle formed between the control
10 connecting path and a last direction of cursor movement path, and calculating a
11 weighted distance.”

12 Robertson does not teach or suggest this combination of features recited in
13 claim 2. The Office cites Robertson at col. 2, lines 22-56, and col. 4, lines 42-55
14 for disclosing these features. However, Robertson says nothing about
15 “determining a control distance”, “calculating a control angle”, or “calculating a
16 weighted distance.” It is unclear how the Office concludes that Robertson
17 discloses these features. Applicant respectfully requests that the Office specify
18 which language in Robertson shows these features. Claim 2 is also allowable over
19 Robertson for these additional reasons.

20 Claim 3 defines an apparatus for activating and deactivating a control
21 grouping having “a control grouping identifier contained within the memory,
22 wherein the control grouping identifier has an active state and an inactive state and
23 wherein the control grouping identifier represents the controls of the control
24 grouping.” Robertson shows no such control grouping identifier in memory.
25

1 The Office suggests that Robertson discloses a control grouping identifier
2 (*Office Action* p.4) referring to Robertson's cursor location signal at col. 4, lines
3 42-45: "A current location storage area ... contains the cursor control signals (i.e.,
4 X and Y coordinates) corresponding to the current location of the cursor on the
5 display." The cited section of Robertson describes the Cartesian coordinates of a
6 cursor location. Robertson does not show "a control grouping identifier" as
7 suggested by the Office because Robertson does not suggest control groups in the
8 first place.

9 Furthermore, the Office contends that Robertson discloses that the identifier
10 has an active state and an inactive state and that the identifier represents the
11 controls of the control grouping (*Office Action* p.4). Applicant disagrees. The
12 Office cites Robertson at col. 6, lines 34-46, which describes storing the location
13 of a cursor so that the location can be returned to in the event that the location
14 needs to be returned to. The Office also cites Robertson at col. 7, lines 20-30,
15 which describes determining if a control cursor position is the last in the control
16 list and whether the control is of a particular pattern display style (i.e., a button or
17 menu item). These sections of Robertson have nothing to do with a "control
18 grouping identifier [that] has an active state and an inactive state and wherein the
19 control grouping identifier *represents the controls of the control grouping*", as
20 recited in claim 3.

21 Accordingly, claim 3 is allowable over Robertson, and the §103 rejection
22 should be withdrawn.

23 Claim 4 is allowable by virtue of its dependency upon claim 3.
24 Additionally, claim 4 recites that "the control grouping identifier is a bit of a
25 control word." The Office cites Robertson's default selection flag data bit as a

1 control grouping identifier (*Office Action* p.4). As described above in the response
2 to the rejection of claim 1, the default selection flag data indicates which of the
3 individually stored cursor locations in the control list is the *one* default selection.
4 The Robertson default selection flag does not identify a control group and, thus, is
5 not a control grouping identifier as recited in claim 4. Accordingly, claim 4 is also
6 allowable over Robertson for this additional reason.

7
8 **New Claims**

9 New claims 5-8 are presented for examination. Based on the above
10 discussion regarding Robertson, Applicant believes that claims 5-8 are also
11 allowable. Support for claims 5 and 8 can be found in the specification at p.11,
12 line 17 through p.12, line 7, and in Fig. 4. Support for claims 6 and 7 can be found
13 in the specification at p.17, line 24 through p.19, line 16.

14
15 **Conclusion**

16 Pending claims 1-8 are in condition for allowance. Applicant respectfully
17 requests reconsideration and prompt issuance of the subject application. If any
18 issues remain that prevent issuance of this application, the Examiner is urged to
19 contact the undersigned attorney before issuing a subsequent Action.

20
21 Respectfully Submitted,

22
23 Dated: Nov. 15, 2020

24 By: 

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